

August 6, 2008

In the Matter of  
Schools and Libraries Universal Service Support Mechanism  
CC Docket No. 02-6

Sirs and Madams,

As members of the educational community, and participants in the E-rate program since its introduction, the Mukilteo School District of Washington State would like to communicate our support to expand eligibility to additional, essential services and products.

### **Item III-B – Filtering Software**

Long before E-rate funding required CIPA compliance, Mukilteo School District understood the importance of protecting our students from obscene or harmful Internet content, and purchased and maintained filtering software. Quality filtering products can be quite costly (in excess of \$25K annually for software in 2005-2007), but are essential to protecting our students, and to comply with E-rate requirements. It is our view that this is a necessary technology for all schools accessing the Internet, and should be eligible for reimbursement. It is also important that the rules recognize all forms of filtering technology, and not limit to only software, hardware, or a service. As with most enterprise-class technologies, a filtering solution is often a combination of all three.

### **Item III-D – Dark Fiber**

The Mukilteo School District strongly supports the inclusion of dark fiber as an eligible service under E-rate. We have utilized T-1/DS-1 circuits for many years to interconnect our schools with the central office. Due to increased reliance on network resources and the growing number of computers within schools, the bandwidth offered by T-1 circuits has become grossly inadequate. We have examined the data-service offerings provided by traditional telecommunication providers, and have found that the cost of any solution that provides even a fraction of the bandwidth available through dark fiber, is prohibitively expensive. Smaller, non-traditional vendors of dark fiber provide virtually unlimited bandwidth at an affordable price – a price remarkably close to the cost of a single T-1 circuit.

Please consider...

- The distinction between providing a fiber-based service that is “lit” (eligible) or “unlit” (ineligible) seems arbitrary. With the advancements in fiber technology and readily available network equipment to utilize it, the need for specialized telecommunication equipment and monitoring by a telecom vendor is no longer required. For example, we currently utilize an E-rate

eligible, fiber-based, transport service from Verizon that provides data rates of up to 9 Mbs, at a cost of \$3,600 per month. There is a dark fiber solution available to us, providing 1000 times the bandwidth for less than \$1,000 per month. This represents orders of magnitude increase in capacity at less than 1/3<sup>rd</sup> the cost. Moving to dark fiber would significantly reduce District costs, and also reduce reimbursement costs for the USAC.

- Dark fiber will reduce costs to schools and to the USAC. Where schools might lease multiple T-1 circuits to provide marginal bandwidth, a single dark fiber would provide extremely high bandwidth at a lower cost. This would in turn, reduce the amount reimbursed by the USAC, allowing the USAC to spread their funds to more entities. Additionally, providing the reimbursement incentive for dark fiber would increase competition in the telecommunications industry, further reducing cost of service to schools and libraries.
- High-capacity networks that can be provided through dark fiber allow districts to redesign the computing infrastructure. An example is the consolidation of remote servers into the data center. Consolidation of servers provides overall lower hardware and on-going support costs, which leaves more money for students and instruction.

### **Item III-E – Firewall and Anti-Virus/Anti-Spam Software**

Similar to how providing a safe environment for student Internet use requires the implementation of a quality filtering solution, firewalls and Anti-Malware solutions are required to adequately protect the networked assets of schools and libraries. These products are no longer optional within the Internet-connected community. It is not responsible to spend large sums of money on computers, servers, and networks, and to leave them vulnerable to sophisticated network attacks and malware. By designating these products as “ineligible” under E-rate, it sends the message that these are optional, discretionary items. If the goal of E-rate is to provide all students with a useful level of access to the Internet, leveling the playing field for rich and poor school districts, it is essential that the assets on the network do not become infected hulks with limited usability, and compounding the spread of malware throughout the Internet. The USAC needs to look beyond the telecommunication connection and look at the complete network ecosystem.

In summary, the Mukilteo School District strongly supports changes to provide E-rate eligibility for filtering solutions, dark fiber, firewall, and anti-malware products. These solutions provide the ability for schools to make student access to the Internet safe and useful. The costs to districts to provide these services can be significant, and the reimbursements by USAC greatly help in allocating dollars directly into student learning instead of supporting the technology infrastructure.

Thank you for your consideration.

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